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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

AMY PATTERSON,) NO. 2:15-cv-00494-NVW
vs.)
TWO FINGERS, LLC, et al)
Defendants.)

TWO FINGERS, LLC, et al)
Counter-claimants,)
vs.)
AMY PATTERSON, et al)
Counter-defendants.)

)

**RENEWED
VERIFIED
MOTION TO ENFORCE
SETTLEMENT AGREEMENT**

AND

**FOR ATTORNEY'S FEES AND
SANCTIONS**

On July 5, 2015, Plaintiff filed her Verified Motion to Enforce Settlement Agreement, doc. 69. Thereafter, the Court extended the time for Defendants to comply with the settlement agreement to the end of the day Friday, July 10, 2015, doc. 71.

Plaintiff has just been advised that Defendants will not make payment by the end of the day tomorrow, July 10, 2015. Exhibit 1. Therefore, Plaintiff finds no reason to delay filing this Renewed Motion after the deadline has expired.

What is most disturbing about Mr. Mullis' breach of the Settlement Agreement is not only his initial apparent lack of authority to settle, but his subsequent lack of candor. In the e-mail dated July 7, 2015, Mr. Mullis advised, "please be advised that we received the final settlement amounts" (emphasis supplied), *see Id.* at Tue, July 07, 2015 7:09 pm. Now, however, Mr. Mullis advises that the check would not be "arriving in the pouch from **LA tomorrow.**" (Emphasis supplied). Clearly, the statement that **we** (meaning counsel's firm) received the final settlement amounts on July 7, 2015 is yet another exhibition of condemnable lack of candor.

Mr. Mullis' gamesmanship should be censured by appropriate sanctions. Therefore, undersigned requests an award of costs, fees and sanctions *irrespective of when the check arrives, if it ever arrives.*

RESPECTFULLY SUBMITTED this 9th day of July, 2015.

STROJNIK P.C.

Peter Strojnik (6464)
Special Counsel for Amy Patterson

VERIFICATION

I verify under the penalty of perjury that the above is true and correct to the best of my knowledge, information and belief.

DATED this 9th day of July, 2015.

